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2 **TORRES | TORRES-STALLINGS**  
3 **A LAW CORPORATION**

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10 Attorneys for Defendant  
11 RAMON MALDONADO, JR.

12  
13 **UNITED STATES DISTRICT COURT**

14  
15 **EASTERN DISTRICT OF CALIFORNIA**

16  
17 UNITED STATES OF AMERICA,

18 Case No.: 1:23-CR-00169-JLT-SKO-1

19 Plaintiff,

20 vs.

21 RAMON MALDONADO, JR.,

22 Defendant

23  
24 **STIPULATION AND ORDER TO**  
25 **VACATE TRIAL DATE AND SET**  
26 **CHANGE OF PLEA DATE**

27 TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, THE HONORABLE  
28 JENNIFER L. THURSTON, AND KAREN ESCOBAR, ASSISTANT UNITED STATES  
ATTORNEY:

29  
30 COMES NOW Defendant, RAMON MALDONADO, JR. by and through his attorney of  
31 record, ALEKXIA TORRES STALLINGS hereby requesting that the Jury Trial date currently  
32 set for March 4<sup>th</sup>, 2025 at 8:30am, be vacated. Counsel is also requesting that the Change of Plea  
33 Date be set for January 21<sup>st</sup>, 2025, at 8:30 am.

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35 Counsel has had the opportunity to discuss this matter with AUSA Karen Escobar, both  
36 parties have agreed to requesting that the Jury Trial date be vacated, and the Change of Plea date  
37 be set. Both parties have reached a disposition on the matter.

1 The parties also agree the delays resulting from the continuance shall be excluded in the  
2 interest of justice pursuant to 18 USC 3161 (h)(7)(A) and 3161 (h)(7)(B)(1) and (IV) because it  
3 results from a continuance granted by the Court at defendant's request on the basis of the Court's  
4 finding that the ends of justice served by taking such action outweigh the best interest of the  
5 public and the defendant in a speedy trial.  
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7  
8 Dated: December 4, 2024

Respectfully Submitted,

9  
10 /s/ Alekxia Torres Stallings  
11 Alekxia Torres Stallings  
12 Attorney for Ramon Maldonado, Jr.

13 Dated: December 4, 2024

14 /s/Karen Escobar  
15 Karen Escobar  
16 Assistant United States Attorney  
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18 **ORDER**

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20 **IT IS SO ORDERED** that the Jury Trial date currently set for March 4, 2025, at  
21 8:30a.m., be vacated, and the Change of Plea date be set to January 21, 2025, at 9:00a.m.

22  
23 **IT IS SO ORDERED.**

24 Dated: December 4, 2024

25   
26 UNITED STATES DISTRICT JUDGE  
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